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Attorneys for DEFENDANTS

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

MICHAELA LANERE, an individual, on
behalf of herself, and on behalf of all
persons similarly situated,

Plaintiffs,

v.

PHH MORTGAGE CORPORATION a
New Jersey corporation, d/b/a LIBERTY
REVERSE MORTGAGE; LIBERTY
HOME EQUITY SOLUTIONS a
California limited liability company and
DOES 1-50, Inclusive,

Defendants.

Case No. 2:24-CV-000652-DJC-SCR

NOTICE OF SETTLEMENT

Complaint Filed: January 23, 2024
Action Removed: February 29, 2024

1 Plaintiff MICHAELA LANERE (“Plaintiff”) and Defendants PHH
2 MORTGAGE CORPORATION and LIBERTY HOME EQUITY SOLUTIONS
3 (“Defendants”) by and through their respective counsel of record (hereinafter
4 collectively, the “Parties”), hereby submit this Joint Stipulation:

5 On January 23, 2024, Plaintiff filed a Class Action Complaint with the Sacramento
6 Superior Court against Defendants, case no. 24CV001137 (“Class Action”). On March
7 29, 2024, Plaintiff filed a separate representative action against Defendants with the
8 Sacramento Superior Court alleging a single cause of action in violation of the Private
9 Attorneys General Act (Labor Code Sections 2698) (“PAGA Action”). On February 29,
10 2024, Defendants removed Plaintiff’s Class Action from the Sacramento Superior Court
11 to the United States District Court, Eastern District of California.

12 On July 24, 2024, the Parties attended mediation with Lisa Klerman and reached
13 a settlement of both the Class Action and the PAGA Action. Pursuant to the terms of
14 the settlement agreement and for purposes of obtaining settlement approval, Plaintiff
15 will amend her Complaint in the PAGA Action to add the class claims alleged in her
16 Class Action Complaint, the Complaint which is at issue in this Court. A Stipulation for
17 Leave to Amend is currently pending with the Court in the PAGA Action.

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1 The Parties stipulate **that all forthcoming deadlines in this action shall be**
2 **vacated** and this action shall be dismissed in its entirety with prejudice following receipt
3 of the conformed First Amended Complaint in the PAGA Action. The Parties intend to
4 file a joint stipulation to dismiss this action once the conformed First Amended
5 Complaint is returned by the Court in the PAGA Action.

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7 Dated: October 16, 2024

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10 By: /s/ Jean-Claude Lapuyade
Jean-Claude Lapuyade, Esq.
11 Shani O. Zakay, Esq.

12 Counsel for PLAINTIFF
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14 Dated: October 16, 2024

ORRICK, HERRINGTON & SUTCLIFFE LLP

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16 By: /s/ Lauren R. Leibovitch
Lauren R. Leibovitch, Esq.
17 Julie A. Totten, Esq.
18 Frank N. Zalom, Esq.

19 Counsel for DEFENDANTS
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SIGNATURE OF CERTIFICATION

I hereby certify that the contents of this document are acceptable to counsel for Defendants, and that I have obtained all necessary authorization to affix Defendants' counsel's electronic signature to the document.

October 16, 2024

JCL LAW FIRM, APC

By: /s/ Jean-Claude Lapuyade
Jean-Claude Lapuyade, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on August , 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Notice of Electronic Filing.

I certify under penalty of Perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 16, 2024.

JCL LAW FIRM, APC

By: /s/ Jean-Claude Lapuyade
Jean-Claude Lapuyade, Esq.